UNITED STATES DISTRICT COURT DISTRICT OF MASSACHUSETTS

UNITED STATES OF AMERICA)	
v.)	Criminal No.: 19-10063-DJC
RANDALL CRATER,)	
Defendant.)	

ASSENTED-TO MOTION TO CONTINUE PRETRIAL DEADLINES AND MOTION FOR STATUS CONFERENCE

The United States of America respectfully files the following Assented-to Motion to Continue Pretrial Deadlines and Motion for a Status Conference. On July 16, 2020, the Court granted a motion to withdraw from representation filed by defendant's prior counsel due to in part to issues related to the ongoing pandemic. (Doc. No. 80). The Court subsequently appointed attorney Scott Lopez as CJA counsel to represent Mr. Crater. (Doc. No. 81). The government has conferred with Mr. Lopez and has agreed to promptly provide him with the discovery in the case if he is unable to obtain in from prior counsel.

Currently, the parties have pre-trial filing deadlines on July 24, 2020 and July 30, 2020. In light of the change of counsel and the fact that new counsel has not yet received the discovery in the case, the government respectfully requests the Court continue the currently scheduled filing deadlines and schedule a pre-trial conference so the parties could address timing of pretrial deadlines and trial.

On July 20, 2020, the government conferred with defendant's counsel, Mr. Lopez, who assented to this motion.

Respectfully submitted,

ANDREW E. LELLING UNITED STATES ATTORNEY

Date: July 23, 2020 By: <u>/s/ Jordi de Llano</u>

Jordi de Llano

Assistant U.S. Attorney

/s/ Caitlin R. Cottingham

Caitlin R. Cottingham

Trial Attorney

CERTIFICATE OF SERVICE

I, Jordi de Llano, hereby certify that the foregoing was filed through the Electronic Court Filing system and will be sent electronically to the registered participants as identified on the Notice of Electronic Filing.

Date: July 23, 2020 /s/ Jordi de Llano

Assistant United States Attorney